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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,	:	Case No. 2:18-CR-365-JNP
	:	
Plaintiff,	:	MOTION TO UNSEAL GOVERNMENT’S
	:	EX PARTE APPLICATION [ECF 1178],
v.	:	AND MOTION TO KEEP A PORTION OF
	:	THE ATTACHED DECLARATION [ECF
JACOB ORTELL KINGSTON, et al.,	:	1178-1] UNDER SEAL
	:	
Defendants.	:	District Judge Jill N. Parrish
	:	

The United States of America, by and through the undersigned, hereby responds to the Court’s Order [ECF 1181] to show cause why docket entry [ECF 1178] should not be unsealed. The United States agrees that the Government’s Ex Parte Application for Post-Indictment Protective Order Under 21 U.S.C. § 853(e)(1)(A) Regarding Funds Held by Two Turkish Companies [ECF 1178] should be unsealed, and moves to unseal it. However, with respect to Special Agent Stephen Washburn’s attached declaration [ECF 1178-1], the United States submits that five paragraphs (¶¶ 20, 22-24, and 27) should remain under seal and be redacted for the following reasons. First, consistent with Department of Justice policy, these paragraphs should

remain under seal to protect the privacy interests of third parties, particularly with regard to criminal conduct of uncharged persons. Second, the information contained in Paragraphs 22-24 and 27 describes the contents of sealed documents that were filed as attachments to the Government's Supplemental *James* Proffer [ECF 495], which was also filed under seal. *See* ECF 499 (Motion to Seal Government's *James* Log). The following table identifies which sealed exhibits are described in Agent Washburn's declaration.

Declaration Paragraph No.	Sealed Exhibit Attached to Supplemental <i>James</i> Log [ECF 495]
22	Exhibit 18
23	Exhibit 19
24	Exhibits 20-21
27	Exhibit 23

Based on the foregoing, the United States moves to redact Paragraphs 20, 22-24, and 27 from the unsealed declaration of Special Agent Stephen Washburn. An electronic copy of a proposed redacted declaration will be furnished to the Court in the event the Court grants this motion.

Respectfully submitted this 17th day of February, 2021.

JOHN W. HUBER
United States Attorney

/s/ John E. Sullivan

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Certificate of Service

I certify that on the 17th day of February, 2021, I caused a copy of the foregoing to be filed through the CM/ECF electronic filing system, and I caused a copy to be emailed to all counsel of record.

/s/ John E. Sullivan

JOHN E. SULLIVAN

Senior Litigation Counsel